

LITE DEPALMA GREENBERG, LLC

Allyn Z. Lite
Michael E. Patunas
Mayra V. Tarantino
Two Gateway Center, 12th Floor
Newark, New Jersey 07102
Telephone: (973) 623-3000
Facsimile: (973) 877-3872
alite@litedepalma.com
mpatunas@litedepalma.com
mtarantino@litedepalma.com

*Attorneys for Defendants Hanmi USA, Inc.,
Hanmi Pharmaceutical Co., Ltd.,
Hanmi Fine Chemical Co., Ltd., and Hanmi
Holdings Co., Ltd.*

**IN THE UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW JERSEY**

ASTRAZENECA AB, AKTIEBOLAGET
HÄSSLE, ASTRAZENECA LP, KBI INC.,
and KBI-E INC.,

Plaintiffs and
Counterclaim Defendants,

v.

HANMI USA, INC., HANMI
PHARMACEUTICAL CO., LTD., HANMI
FINE CHEMICAL CO., LTD, and HANMI
HOLDINGS CO., LTD.,

Defendants and
Counterclaim Plaintiffs.

Civil Action No. 3:11-CV-00760-JAP-TJB

**DECLARATION OF RENITA S. RATHINAM IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR
INJUNCTION PENDING APPEAL**

I, Renita S. Rathinam, state and declare as follows:

1. I am an attorney at law in the District of Columbia and a partner of Sughrue Mion, PLLC, attorneys for Defendants Hanmi USA, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd. (collectively “Hanmi”).

2. I submit this declaration in support of Hanmi’s Opposition to Plaintiffs’ Motion for Injunction Pending Appeal.

3. True and accurate copies of the exhibits listed in the following table are being filed in support of Hanmi’s Opposition to Plaintiffs’ Motion for Injunction Pending Appeal.

Exhibit No.	Description
A	Correspondence between M. Boland and H. Renk, August 27, 2013.
B	Settlement Agreement, Execution Copy, May 21, 2013 (Under Seal)
C	J. Jonas Anderson & Peter S. Menell, Informal Deference: An Historical, Empirical, And Normative Analysis of patent Claim Construction, NW. U. L. REV. (forthcoming) (manuscript at 38), available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2150360
D	Christopher Anthony Cotropia, Is Patent Claim Interpretation Review Deference or Correction Driven?, Working Paper May 16, 2013 at 7-8, available at http://ssrn.com/abstract=2265962 or http://dx.doi.org/10.2139/ssrn.2265962
E	Thomas W. Krause & Heather F. Auyang, <i>What Close Cases and Reversals Reveal About Claim Construction at the Federal Circuit</i> , 12 J. MARSHALL REV. INTELL. PROP. L. 583 (2013)
F	H.R. Rep. No 98-857, pt. 1, at 14 (1984), reprinted in 1984 U.S.C.C.A.N. 2647

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of September 2013.



Renita S. Rathinam